

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

ALAN GOLDMAN

Plaintiff

V

McCONNELL VALDES, LLC;
ANTONIO A. ARIAS-LARCADA, ET AL

Defendants

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CIVIL NO.: 24CV01136

PLAINTIFF, ALAN GOLDMAN'S MOTION REQUESTING AN EXTENSION OF TIME
TO PROVIDE PLAINTIFF'S ANSWERS TO INTERROGATORIES

TO THE HONORABLE COURT:

COMES NOW, Plaintiff, Alan Goldman, by and through his undersigned counsel Francisco
M. López-Romo, and respectfully States and Prays as follows:

1. As of this date, November 4th, 2024, Plaintiff, Alan Goldman has provided his documentary evidence, that consists of:
 - Set One: bate-stamped pages 1 - 3,152; and
 - Set Two: bate-stamped pages 1 - 7,466; and
2. As of this date, November 4th, 2024, Plaintiff, Alan Goldman has also provided to Defendants, Mr. Goldman's medical and hospitalization records: bate-stamped pages 1-266 pages (University of Vermont Health Network).
3. On November 5th, 2024, Plaintiff, Alan Goldman shall be providing bate-stamped 267 – 388 (Dr. J. S. Stone's Patient's Record (Redacted)).

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4. Plaintiff, Alan Goldman's answers to interrogatories were due on October 31, 2024.
Please see: Initial scheduling and Settlement Conference Minutes, Document 26.
5. As of this date, November 4th, 2024, due to Plaintiff, Alan Goldman's poor health and multiple medical appointments, Mr. Goldman has been unable to provide his complete answers to Defendants' two sets of interrogatories that consist of twenty-four (24) questions and then fifteen (15) additional questions, several of which also require Plaintiff, Mr. Goldman, to make specific references to any supporting documents.
6. During the past few months, Mr. Goldman has had several medical appointments to treat his medical conditions, as follows: Wednesday, June 5, 2024 - Patient Alan B. Goldman saw Benjamin Flinn, MD for a New Patient Visit. The following issues were addressed: Personal history of skin cancer, Hoarseness, Immunization due, Prostate cancer screening, screening for AAA (aortic abdominal aneurysm), Memory impairment, Neck pain, History of bladder cancer, Confusion, Colon cancer screening, screening for lung cancer, Encounter to establish care, Visual impairment, LYME AB SCREEN, IGG AND IGM for Memory impairment, PSA SCREEN for Prostate cancer screening. Blood Pressure: 140/90, BMI: 31.02. Friday, June 7, 2024 - MRI. The following issues were addressed: Memory impairment, Confusion. Friday, June 7, 2024 - CAT Scan. The following issues were addressed: Memory impairment, Confusion, Visual impairment. Medications Given: IohexoL (OMNIPAQUE 350). Last given 6/7/2024 11:47. Friday, June 7, 2024 - MRI. The following issue was addressed: Neck pain. Thursday, June 20, 2024 - Patient Alan B. Goldman saw Benjamin Flinn, MD for a Follow-up, Telemedicine Video Visit. The following issues

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were addressed: Benign prostatic hyperplasia (BPH) with straining on urination, Hypothyroidism (unspecified type), Type 2 diabetes mellitus without complication, without long-term current use of insulin, Cervical spondylosis, Foraminal stenosis of cervical region, Shortness of breath, OSA (obstructive sleep apnea), Mixed hyperlipidemia, TIA (transient ischemic attack), Colon cancer screening. Friday, June 28, 2024 - Patient Alan B. Goldman saw RRT CVMC. The following issue was addressed: Shortness of breath. Done Today: PULMONARY FUNCTION TESTING for Shortness of breath. Tuesday, July 16, 2024 - Patient Alan B. Goldman saw Benjamin Flinn, MD for a Follow-up on Memory Problems. The following issue was addressed: Memory impairment. Please do start taking your atorvastatin. This is an important medicine for you to be taking to prevent a stroke which could further negatively impact your cognitive status. Your MRI of your head did show that you have some age-related ischemic changes in your brain, and I feel these are very likely impacting your memory. Please call neurology as soon as possible, (802) 862-5759. Wednesday, July 17, 2024 - Patient Alan B. Goldman saw David Ospina, MD for a Telemedicine Phone Call. The following issue was addressed: Elevated PSA. Thursday, July 25, 2024 - CAT Scan. The following issue was addressed: Screening for lung cancer. Thursday, July 25, 2024 - Patient Alan B. Goldman saw Case Manager Samara. Thursday, August 8, 2024 - Patient Alan B. Goldman saw Benjamin Flinn, MD for Hypertension. The following issues were addressed: Benign prostatic hyperplasia (BPH) with straining on urination, Hypothyroidism (unspecified type), Type 2 diabetes mellitus without complication, without long-term current use of insulin, Confusion,

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Anxiety. Friday, August 16, 2024 - Patient Alan B. Goldman saw Jose Lopez, MD. The following issue was addressed: Lyme disease. Thursday, September 5, 2024 - Patient Alan B. Goldman saw Waqar Waheed, MD for a Follow-up. The following issues were addressed: Memory loss, Spells of decreased attentiveness, Ulnar neuropathy of left upper extremity, Cerebral microvascular disease. Tuesday, October 8, 2024 - MRI. The following issue was addressed: Screening for AAA (aortic abdominal aneurysm). Thursday, October 10, 2024 - Patient Alan B. Goldman saw Amy Renner, NP for a Follow-up on Loss of Vision, Lyme Disease. The following issues were addressed: Urinary urgency, History of Lyme disease, Rash, Transitional cell carcinoma of right renal pelvis. Monday, October 14, 2024 - Patient Alan B. Goldman saw Care Manager Rori. Monday, October 14, 2024 - Patient Alan B. Goldman saw Brian Rodriguez, MD for Growth. The following issues were addressed: Actinic keratosis, Seborrheic keratoses, Facial benign neoplasm. Thursday, October 17, 2024 - Patient Alan B. Goldman saw David Ospina, MD for a Follow-up. The following issues were addressed: History of bladder cancer, BPH with elevated PSA. Monday, October 21, 2024 - Patient Alan B. Goldman saw Care Manager Rori.

7. The following additional medical appointments further underscore Plaintiff, Mr. Goldman's ongoing medical care: On Wednesday, November 20, 2024 - Patient Alan B. Goldman is scheduled for a Cystoscopy with Douglas Dahl, MD, to monitor recurrence risk from prior bladder and prostate cancers. Arrival Time: 11:20 AM EST, Start Time: 11:40 AM EST, Location: MGH Department of Urology, 165 Cambridge St, 7th Fl, Boston MA 02114, Contact: 857-238-3838. On Thursday, November 21,

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2024 - Patient Alan B. Goldman is scheduled for MRI Prostate, ordered by Dr. Ospina.

Arrival Time: 3:45 PM EST, Start Time: 4:30 PM EST (1 hour), Location: UVM Medical Center Radiology MRI - Main Campus, 111 Colchester Ave, Burlington VT 05401, Contact: 802-847-8900.

8. The upcoming November 20th, 2024, Cystoscopy and November 21st, 2024, MRI Prostate examination, reinforce the pressing and continuous nature of Mr. Goldman's medical obligations. Any disruption to this highly coordinated and essential care - such as forcing Mr. Goldman to travel to Puerto Rico for a redundant examination - would place him at serious health risk. His need for regular medical evaluations, treatments, and specialized imaging illustrates the potential harm and health jeopardy imposed by any unnecessary travel, which could prevent him from accessing timely medical intervention for his prior cancers and other medical challenges.
9. It goes without saying: Plaintiff, Mr. Goldman is immune compromised and is presenting serious concerns for any non-essential travel.
10. In view of Plaintiff, Mr. Goldman's medical appointments and health conditions, he has not been able to provide his answers to the two interrogatories, so it is respectfully requested that an additional thirty (30) days be granted so that Plaintiff, Goldman may provide his answers to Defendants' two interrogatories.

WHEREFORE, Plaintiff, Alan Goldman respectfully requests from this Honorable Court to take notice of this motion and to grant an extension of time of thirty (30) days to submit Plaintiff, Goldman's answers to Defendants' two interrogatories, and to grant such further relief as the Court may deem to be just and proper.

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RESPECTFULLY REQUESTED.

In Miami, Florida, on this 4th day of November 2024.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 4th day of November 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all the counsel of record.

s/Francisco M. López-Romo

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